

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Civil Action No. 2:21-CV-00022-Z

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

**APPENDIX IN SUPPORT OF RELATOR’S OPPOSITION TO PLANNED
PARENTHOOD GULF COAST’S MOTION FOR PROTECTIVE ORDER AND
TO QUASH RELATOR’S NOTICE OF DEPOSITION OF MELANEY LINTON**

Exhibit	Description	Page Numbers
1	Email Chain October 11-October 21, 2022	App. 001-015
2	Email Chain October 11-October 26, 2022	App. 016-030
3	Email Chain October 11-November 8, 2022	App. 032-054

4	M. Linton Deposition Notices	App.055-061
---	------------------------------	-------------

Exhibit 1

From: [Lollar, Tirzah](#)
To: [Heather Hacker](#); [Andrew Stephens](#); dashby@omm.com; [Raymond Winter](#)
Cc: [Amy Hilton](#); [Margolis, Craig D.](#); [Odell, Christopher M.](#); lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; [Reeder-Ricchetti, Emily](#); [Pieper, Megan](#); [Martin, Meghan C.](#); [Gerstner, Alyssa](#); rgalin@omm.com
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z
Date: Friday, October 21, 2022 6:28:54 PM
Attachments: [image001.png](#)
[image002.png](#)

Heather, we will do our best to get back to you on these on Monday. Thanks

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Heather Hacker <heather@hackerstephens.com>

Sent: Friday, October 21, 2022 7:07 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; zzz.External.dashby@omm.com <dashby@omm.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

We do not want to push depositions past December 8. But we still have a few other loose ends to tie up before we can nail the schedule down, so maybe that will help us figure out when Linton can be deposed.

First, the former employees. Danny was going to get back to us with dates for Emily Stewart and I think he was checking on Rosemary Coluccio. I believe you were going to get back to us on Marianne DeJong.

Second, if you could let us know who you are designating as corporate reps, that may also help.

Third, I believe you wanted to discuss the PPST/PPCC/PPSA depositions. If you are planning to put the same person up for all three and can agree that that person's answers are binding as to all three entities, then we will probably be able to do them on one day (Nov 17) rather than three (Nov 16-18).

Can you all get back to us on these questions by Monday? Also, if you could please provide the exact locations of the depositions if you all want to defend at your offices, we can issue amended notices.

Thanks,
Heather

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Sent: Friday, October 21, 2022 4:02 PM
To: Heather Hacker <heather@hackerstephens.com>; Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

We think everyone is working productively on a challenging schedule.

Would you be able to depose Linton on Dec 10 in Houston? We know it's a Saturday, but we are trying to find a date that will work.

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Heather Hacker <heather@hackerstephens.com>
Sent: Friday, October 21, 2022 3:16 PM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; zzz.External.dashby@omm.com <dashby@omm.com>; Raymond

Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

PPFA will only make Kramer available in Chicago on December 8 and we are unavailable December 9, so those dates do not work. December 16 is too late.

We're not going to keep playing whack-a-mole with you and Danny on these dates. We've been more than reasonable about trying to accommodate witnesses' schedules and preferred locations but if all the Defendants cannot coordinate on these dates (i.e., continue to propose opposing dates) and won't make their witnesses reasonably available during the discovery period, we will have to go to the Court.

Heather

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Friday, October 21, 2022 1:31 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew:

Thanks for confirming on the locations. Linton is unfortunately not available on Dec 1 or Dec 5 in Houston. We would reiterate our offer for her to be deposed on Dec 8 or 9 in Houston. If neither of those dates work, Dec 16 in Houston is another option.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW
Washington, DC 20001-3743
T: +1 202.942.6199
Tirzah.Lollar@arnoldporter.com
www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Friday, October 21, 2022 12:20 PM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <[dashby@omm.com](mailto:zzz.External.dashby@omm.com)>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <[lgodesky@omm.com](mailto:zzz.External.lgodesky@omm.com)>; zzz.External.jchapa@omm.com <[jchapa@omm.com](mailto:zzz.External.jchapa@omm.com)>; zzz.External.asantella@omm.com <[asantella@omm.com](mailto:zzz.External.asantella@omm.com)>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <[rgalin@omm.com](mailto:zzz.External.rgalin@omm.com)>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

No, we cannot depose Linton, who lives in Houston, in New York on December 5. If you want her deposition to take place in NY, then it would need to be on Nov. 28 when we do the other East Coast witnesses and Custer/Barrow-Klein depositions would need to shift over one day to Nov. 29-Dec. 1, then we could do PPGC 30b6 on December 5. Otherwise if Linton can't be available on Dec 5, we can do her deposition on Dec 1 in Houston and do PPGC on Dec 5.

The other locations you specified are fine.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Sent: Thursday, October 20, 2022 6:02 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we have confirmed that the dates you proposed work, but we just need to confirm the locations in red below. Please let us know.

Nov 3: Hons (San Antonio)
Nov 10: Rossiter (DC)
Nov 17: PPST/CC/SA (San Antonio)
Nov 21: Lambrecht (Austin)
Nov 22: Sokolow (Austin)
Dec 1: PPGC (Houston)
Dec 5: Linton (NY)
Dec 6: PPGT (Austin)

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW
Washington, DC 20001-3743
T: +1 202.942.6199
Tirzah.Lollar@arnoldporter.com
www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, October 20, 2022 2:52 PM

To: Andrew Stephens <andrew@hackerstephens.com>; zzz.External.dashby@omm.com <dashby@omm.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.

<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>;
zzz.External.rgalin@omm.com <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew:

Thanks for sending the list. We are confirming for the Affiliates. Would you be able to do Linton in NY if we can do Dec 5?

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW
Washington, DC 20001-3743
T: +1 202.942.6199
Tirzah.Lollar@arnoldporter.com
www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 20, 2022 12:25 PM

To: zzz.External.dashby@omm.com <dashby@omm.com>; Lollar, Tirzah

<Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>;

Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.

<Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>;

zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com

<asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>;

Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.

<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>;

zzz.External.rgalin@omm.com <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Danny, Tirzah,

Please let us know if this schedule will work for Defendants:

Nov 3: Hons (Austin/SA)

Nov 10: Rossiter (DC)

Nov 15: Trivisonno (FL)

Nov 17: PPST/CC/SA (Austin/SA)
Nov 21: Lambrecht (Austin)
Nov 22: Sokolow (Austin)
Nov 28: PPFA Custer (NY)
Nov 29: PPFA Barrow-Klein (DC)
Nov 30: Barrow-Klein (DC)
Dec 1: PPGC (Houston)
Dec 5: Linton (Houston)
Dec 6: PPGT (Austin/Dallas)
Dec 7: Dudney (Chicago)
Dec 8: Kramer (Chicago)

Andrew

From: Ashby, Danny S. <dashby@omm.com>
Sent: Wednesday, October 19, 2022 7:26 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Yes, Vickie would be in DC and Kim would be in NYC (or possibly Philadelphia if you'd prefer). Separately, we represent Emily Stewart and will work on dates for her -- and we will circle back soon on Rosemary Coluccio. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Wednesday, October 19, 2022 5:55 PM

To: Ashby, Danny S. <dashby@omm.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: [SUSPICIOUS MESSAGE] RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Danny. Do you have proposed locations for Kim Custer and Vickie Barrow-Klein?

Andrew

From: Ashby, Danny S. <dashby@omm.com>

Sent: Wednesday, October 19, 2022 5:18 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Following up on this, we expect to have two 30(b)(6) witnesses -- Kim Custer and Vickie Barrow-Klein -- and you've asked for a fact witness deposition of Vickie. Kim is available November 21 or 22 and Vickie is available November 29 or 30. In response to your email about providing multiple dates for each witness, perhaps you can slot in the ones where the dates work on your end and get back to us where you need other dates so we're not canvassing the entire group again. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dasbhy@omm.com

From: Ashby, Danny S.

Sent: Wednesday, October 19, 2022 11:18 AM

To: 'Andrew Stephens' <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

We're working on the 30(b)(6) witness schedule and will get back to you ASAP on that -- as well as the two additional folks identified below. In the interim, based on the schedules we've confirmed so far, we would propose the following:

Teri Trivisonno - November 15 (Naples, FL)

Tamara Kramer - November 29 (Chicago)

Louis Dudney - December 9 (Chicago)

Louis has no availability on or before November 30, which is why we're proposing December 9. And, of course, we would agree that taking his deposition then would not affect the trial date or any other deadlines in the case.

Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Wednesday, October 19, 2022 11:03 AM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Ashby, Danny S. <dashby@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Tirzah,

Thank you for sending proposed dates. Please let us know proposed dates for the PPFA Affiliate 30(b)(6) depositions so we can see how those will fit into the schedule. As you know, we noticed several of the 30(b)(6) depositions for the last week of November and would like to take those depositions at the end of the discovery period as noticed. Relator is generally available in November so we have some flexibility there. We also plan to subpoena Marianne DeJong unless you all will be representing her and can accept service.

Danny,

If you could provide proposed dates for the PPFA witnesses and the PPFA 30(b)(6) deposition that would help get the schedule nailed down. We also plan to subpoena Emily Stewart and Rosemary Coluccio unless you all will be representing them and can accept service.

Andrew

Andrew B. Stephens
Partner

HACKERSTEPHENS LLP

http://secure-web.cisco.com/1dT0gF5XcyAXTjRQtyOgeL1On3vrP4rPwnM2DwB-VGjAgBUfMqSNo9Ygl5w-jnyGq8rDiQvpUVt3s2fMC0vOk8HvoaJulcBHRJXoHkE1N5JTjhfaUSG25tvogTw76nQ7Umv_9Fwlq4XVGhe0ua4_id_f8_aZOVrxH8J2ysBZLX7pw8G1kdgiB2l-yV-fQkuEbT0kKv8LIVa5ujZ9_D8viX8FL-LuxXfu0asPrDfGZA3WMY0K-

HWlwupuLcSvEfs4F90nwzrKVBWwDeGZcoAdNSwGSDFfXNDN2jZbVrnzPee8bfCdJHcxezkb53KswApEO2710uispjCTZamlH7ifDjf0rcM3-FneiYt_XcTT3lm3MCIuIIKIQRu1jkZn2oaxHYw71egFAFa0VbtnDlCo09iKhJLcls7FEoXFLNIDyoNQZSf3LrYT6QoHucotHzUgOAvrOhoMSN3sZUKDQrQ/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Tuesday, October 18, 2022 5:55 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Following up on our call from yesterday and the notices Plaintiffs sent before the parties could discuss scheduling, please let us know if the below dates will work for the depositions you have requested.

Jeffrey Hons - Nov 3 (Austin)

Lou Rossiter - Nov 10 or 17 (Washington, DC)

Ken Lambrecht - Nov 20 (Austin)

David Sokolow - Nov 22 (Austin)

Melaney Linton - Dec 9 (Houston) - Ms. Linton has no availability on or before Nov 30, so we had to propose a date just outside of the Nov 30 close of discovery. We would agree that taking her deposition on Dec 9 would have no impact on the trial date.

We are still working on dates and locations for the Affiliates' 30b6 depositions and will get back to you as soon as possible on them. But I did want to flag that Nov 1 will not work for the PPST 30b6 deposition.

PPFA will respond about their depositions.

Please also let us know if Nov 29 or 30 will work for the deposition of Relator. We assume that this deposition will take place in Austin (exact location to be determined by Defendants), but please confirm that Austin will work.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:54 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Margolis, Craig D.

<Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>;
Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com
<lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>;
zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com
<asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>;
Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thanks, Tirzah. Only change in these is the dates.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, October 13, 2022 6:43 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Margolis, Craig D.

<Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>;
Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com;
dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>;
Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we would like to speak with you about the 30b6 notices on Monday. I'm just checking availability on our side and will revert with a proposed timeframe.

Did anything thing change in these amended notices other than the dates?

Thanks

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:40 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Counsel:

Attached are Amended Notices of 30(b)(6) Depositions of PPFA, PPGT and PPGC. If you would like to discuss the dates or locations of these depositions, or the other depositions we have noticed, please let us know and we can schedule a call. Relator and the State are available anytime on Monday (10/17), Wednesday morning (10/19), or Thursday morning (10/20).

Best regards,

Andrew

From: Andrew Stephens

Sent: Tuesday, October 11, 2022 8:04 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Please see attached deposition notices. If you would like to discuss dates and locations please let us know and we can set up a call.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS LLP

http://secure-web.cisco.com/1dT0gF5XcyAXTjRQtyOgeL1On3vrP4rPwnM2DwB-VGjAgBUfFmqSNo9Ygl5w-jnyGq8rDiQvpUVt3s2fMC0vOk8HvoaJulcBHRJXoHkE1N5JTjhfaUSG25tvogTw76nQ7Umv_9Fwlq4XVGhe0ua4_iD_f8_aZOVrxH8J2ysBZLX7pw8G1kdqiB2l-yV-fQkuEbT0kKv8LlVa5ujZ9_D8viX8FL-LuxXfu0asPrDfGZA3WMY0K-HWlwupuLcSvEfs4F90nwzrKVbWwDeGZcoAdNSwGSDFfXNDN2jZbVrnzPee8bfCdJHcxexkb53KswApEO2710uispjCTZamlH7ifDjf0rcM3-FneiYt_XcTT3lm3MCIuIIKIQRu1jkZn2oaxHYw71egFAFa0VbtnDlCo09iKhJLcls7FEoXFLNIDyoNQZSf3LrYT6QoHucotHzUgOAvrOhoMSN3sZUkDQrQ/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Andrew Stephens

Sent: Thursday, September 1, 2022 12:07 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Sixth Requests for Production to PPFA and the PPFA Affiliates.

Exhibit 2

From: [Andrew Stephens](#)
To: [Lollar, Tirzah](#); dashby@omm.com; [Raymond Winter](#)
Cc: [Amy Hilton](#); [Heather Hacker](#); [Margolis, Craig D.](#); [Odell, Christopher M.](#); lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; [Reeder-Ricchetti, Emily](#); [Pieper, Megan](#); [Martin, Meghan C.](#); [Gerstner, Alyssa](#); rgalin@omm.com
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z
Date: Wednesday, October 26, 2022 2:14:21 PM
Attachments: [image001.png](#)
[image002.png](#)

Tirzah,

Relator is available in Houston on December 2 at Arnold & Porter office.

Andrew

From: Andrew Stephens
Sent: Tuesday, October 25, 2022 4:14 PM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Tirzah, Danny,

Please see attached amended deposition notices for the Planned Parenthood witnesses and a notice of subpoenas for Marianne De Jong and Ronda Exnicious. The amended notices and subpoenas should reflect the agreed dates and locations listed below, with open issues highlighted and noted at end.

Relator is available on December 2 and we should have a location to you tonight or first thing tomorrow morning. Per Ray's email, Lochabay is available on December 8 in Dallas at the address listed below. I penciled in TX/HHSC 30(b)(6) on December 5 since that is one of the few remaining open dates, but Texas will need to confirm that date. Tirzah, we also need to discuss Linton.

Andrew

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 10: Rossiter (DC), Arnold & Porter, 601 Massachusetts Ave., NW Washington, DC 20001

Nov 14: De Jong (Dallas), Office of the Attorney General, 1412 Main Street, Dallas, TX 75202

Nov 15: Trivisonno (Naples FL), 4851 Tamiami Trail North Park Shore, Suite 200, Naples, FL 34103

Nov 16: Exnicious (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 17-18: PPST/PPCC/PPSA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 21: Lambrecht (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Sokolow (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Linton (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 28: PPFA Custer (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 29: PPFA Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 30: Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Dec 1: PPGC (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 2: Relator (location TBD)

Dec 5: TX/HHSC 30(b)(6) (Austin), Office of the Attorney General, 300 West 15th Street, Austin, TX 78701

Dec 6: PPGT (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 7: Dudney (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Kramer (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Lochabay (Dallas), 2100 Ross Avenue, 21st Floor, Dallas, TX 75201

Dec 9: Collucio (New York), 7 Times Square Tower, New York, NY 10036

Pending dates/locations from PPFA: Stewart, Collucio

Pending dates/locations from PP Affiliates: Linton

Pending dates/locations from TX: TX/HHSC 30(b)(6)

Pending dates/locations from 3rd parties: Maxwell, Spears, De Jong, Exnicious

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Monday, October 24, 2022 7:25 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>;

Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.

<Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com;

asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper,

Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.

<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>;

rgalin@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Heather:

Following up on our call from earlier today, we wanted to confirm that you agreed that the 30b6 for PPST/PPSA/PPCC will take place on Nov 17 with Nov 18 as a spill over date if needed.

I'm not authorized at this point to accept service for Marianne DeJong.

See below for deposition locations. Note that we are still confirming that Kreager Mitchell has sufficient available conference room space. We know you want to issue new notices and would agree that if we have to change the location from Kreager Mitchell for the 2 depositions in San Antonio, you would not need to re-notice.

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209
Nov 10: Rossiter (DC) AP DC, 601 Massachusetts Ave., NW Washington, DC 20001
Nov 17: PPST/CC/SA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209
Nov 21: Lambrecht (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701
Nov 22: Sokolow (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701
Dec 1: PPGC (Houston) AP Houston, 700 Louisiana Street, Suite 4000, Houston, TX 77002
Dec 6: PPGT (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701

Unfortunately, we have been unable to come up with an alternative date for Linton beyond the ones we previously offered. We would reiterate our offer to double track if you can take her deposition on December 8 in Houston. She is also available Dec 9, 10, or 16 in Houston. If you are willing to take her deposition remotely, Dec 5 may still be an option. Please let us know if you would be able to make any of these options work.

As discussed, please let us know Relator's availability Dec 1-9 for Relator's deposition and the location.

Finally, Defendants would like to depose Lochabay on Nov 29-Dec 2 or Dec 8-9. We assume the deposition will be in Austin per Ray's note from some time ago, but please let us know.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW
Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Monday, October 24, 2022 5:35 PM

To: zzz.External.dashby@omm.com <[dashby@omm.com](mailto:zzz.External.dashby@omm.com)>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thank you, Danny.

Andrew

From: Ashby, Danny S. <ashby@omm.com>

Sent: Monday, October 24, 2022 3:20 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew and Heather -

Following up on our call earlier today, we're still working on dates for Emily Stewart and Rosemary Collucio. For Rosemary, you asked us to look at December 9 in NY and we will do that.

Separately, I was mistaken about the location of Kim Custer's 30(b)(6) deposition. We will present her in DC on the 28th, which should be easier for everyone given that Vickie Barrow-Klein is also scheduled in DC on the 29th and 30th. And both of these depositions will be in our

DC office. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Thursday, October 20, 2022 11:25 AM
To: Ashby, Danny S. <dashby@omm.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Danny, Tirzah,

Please let us know if this schedule will work for Defendants:

Nov 3: Hons (Austin/SA)
Nov 10: Rossiter (DC)
Nov 15: Trivisonno (FL)
Nov 17: PPST/CC/SA (Austin/SA)
Nov 21: Lambrecht (Austin)
Nov 22: Sokolow (Austin)
Nov 28: PPFA Custer (NY)
Nov 29: PPFA Barrow-Klein (DC)
Nov 30: Barrow-Klein (DC)
Dec 1: PPGC (Houston)
Dec 5: Linton (Houston)
Dec 6: PPGT (Austin/Dallas)
Dec 7: Dudney (Chicago)
Dec 8: Kramer (Chicago)

Andrew

From: Ashby, Danny S. <dashby@omm.com>
Sent: Wednesday, October 19, 2022 7:26 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Yes, Vickie would be in DC and Kim would be in NYC (or possibly Philadelphia if you'd prefer). Separately, we represent Emily Stewart and will work on dates for her -- and we will circle back soon on Rosemary Coluccio. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dasbhy@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Wednesday, October 19, 2022 5:55 PM
To: Ashby, Danny S. <dashby@omm.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: [SUSPICIOUS MESSAGE] RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Danny. Do you have proposed locations for Kim Custer and Vickie Barrow-Klein?

Andrew

From: Ashby, Danny S. <dashby@omm.com>
Sent: Wednesday, October 19, 2022 5:18 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Following up on this, we expect to have two 30(b)(6) witnesses -- Kim Custer and Vickie Barrow-Klein -- and you've asked for a fact witness deposition of Vickie. Kim is available November 21 or 22 and Vickie is available November 29 or 30. In response to your email about providing multiple dates for each witness, perhaps you can slot in the ones where the dates work on your end and get back to us where you need other dates so we're not canvassing the entire group again. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dasbhy@omm.com

From: Ashby, Danny S.
Sent: Wednesday, October 19, 2022 11:18 AM
To: 'Andrew Stephens' <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>;

Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

We're working on the 30(b)(6) witness schedule and will get back to you ASAP on that -- as well as the two additional folks identified below. In the interim, based on the schedules we've confirmed so far, we would propose the following:

Teri Trivisonno - November 15 (Naples, FL)

Tamara Kramer - November 29 (Chicago)

Louis Dudney - December 9 (Chicago)

Louis has no availability on or before November 30, which is why we're proposing December 9. And, of course, we would agree that taking his deposition then would not affect the trial date or any other deadlines in the case.

Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Wednesday, October 19, 2022 11:03 AM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Ashby, Danny S. <dashby@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M.

<asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Tirzah,

Thank you for sending proposed dates. Please let us know proposed dates for the PPFA Affiliate 30(b)(6) depositions so we can see how those will fit into the schedule. As you know, we noticed several of the 30(b)(6) depositions for the last week of November and would like to take those depositions at the end of the discovery period as noticed. Relator is generally available in November so we have some flexibility there. We also plan to subpoena Marianne DeJong unless you all will be representing her and can accept service.

Danny,

If you could provide proposed dates for the PPFA witnesses and the PPFA 30(b)(6) deposition that would help get the schedule nailed down. We also plan to subpoena Emily Stewart and Rosemary Coluccio unless you all will be representing them and can accept service.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS LLP

http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlIiNGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgao6ZH9grcJhfXFFXeFSIrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qrb14WlxAtvIrYlrfP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FiqPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Tuesday, October 18, 2022 5:55 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Raymond Winter
<Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>;
Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.
<Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com;
jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan
C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Following up on our call from yesterday and the notices Plaintiffs sent before the parties could discuss scheduling, please let us know if the below dates will work for the depositions you have requested.

Jeffrey Hons - Nov 3 (Austin)

Lou Rossiter - Nov 10 or 17 (Washington, DC)

Ken Lambrecht - Nov 20 (Austin)

David Sokolow - Nov 22 (Austin)

Melaney Linton - Dec 9 (Houston) - Ms. Linton has no availability on or before Nov 30, so we had to propose a date just outside of the Nov 30 close of discovery. We would agree that taking her deposition on Dec 9 would have no impact on the trial date.

We are still working on dates and locations for the Affiliates' 30b6 depositions and will get back to you as soon as possible on them. But I did want to flag that Nov 1 will not work for the PPST 30b6 deposition.

PPFA will respond about their depositions.

Please also let us know if Nov 29 or 30 will work for the deposition of Relator. We assume that this deposition will take place in Austin (exact location to be determined by Defendants), but please confirm that Austin will work.

Thanks,
Tirzah

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:54 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Margolis, Craig D.

<Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>;

Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com

<lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>;

zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com

<asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>;

Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thanks, Tirzah. Only change in these is the dates.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, October 13, 2022 6:43 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Margolis, Craig D.

<Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>;

Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com;

dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>;

Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we would like to speak with you about the 30b6 notices on Monday. I'm just checking availability on our side and will revert with a proposed timeframe.

Did anything thing change in these amended notices other than the dates?

Thanks

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:40 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Counsel:

Attached are Amended Notices of 30(b)(6) Depositions of PPFA, PPGT and PPGC. If you would like to discuss the dates or locations of these depositions, or the other depositions we have noticed, please let us know and we can schedule a call. Relator and the State are available anytime on Monday (10/17), Wednesday morning (10/19), or Thursday morning (10/20).

Best regards,

Andrew

From: Andrew Stephens

Sent: Tuesday, October 11, 2022 8:04 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Please see attached deposition notices. If you would like to discuss dates and locations please let us know and we can set up a call.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS^{LLP}

http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlINgXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSIrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qrbri4WlxAtvIrYrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FiqPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWlJQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Andrew Stephens

Sent: Thursday, September 1, 2022 12:07 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Sixth Requests for Production to PPFA and the PPFA Affiliates.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS^{LLP}

http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXf9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJLL463FRnWBkrlINgXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSIrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qrbri4WlxAtvIrYrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FiqPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWlJQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Andrew Stephens

Sent: Wednesday, August 31, 2022 10:30 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Attached are Relator's Fifth Requests for Production to the PPFA Affiliates.

Andrew

Andrew B. Stephens
Partner

HACKERSTEPHENS^{LLP}

http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlilNGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpKLoOunJTvvIMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgaa06ZH9grcJhfXFFXeFSIrVggWLC58-PuyLdWrzdpVgBBtFxTIL48qrbrl4WlxAtvIrYlrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWlJCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Andrew Stephens

Sent: Tuesday, August 23, 2022 11:13 AM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Exhibit 3

From: [Andrew Stephens](#)
To: [Lollar, Tirzah](#); [Heather Hacker](#); [Reeder-Ricchetti, Emily](#); [Raymond Winter](#); [Hilton, Christopher](#)
Cc: [Amy Hilton](#); [Margolis, Craig D.](#); [Odell, Christopher M.](#); [lgodesky@omm.com](#); [jchapa@omm.com](#); [asantella@omm.com](#); [Pieper, Megan](#); [Martin, Meghan C.](#); [Gerstner, Alyssa](#); [rgalin@omm.com](#); [Ramer, Paula](#); [dashby@omm.com](#)
Subject: Re: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z
Date: Tuesday, November 8, 2022 6:55:23 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)

Tirzah,

You can present Ms. Linton on the 22nd or seek a protective order.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>
Sent: Tuesday, November 8, 2022 6:51:00 PM
To: Heather Hacker <heather@hackerstephens.com>; Andrew Stephens <andrew@hackerstephens.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com <lgodesky@omm.com>; jchapa@omm.com <jchapa@omm.com>; asantella@omm.com <asantella@omm.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; dashby@omm.com <dashby@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Heather:

Linton is not available on Nov 22. As for finding a date in the discovery period, we of course see our back and forth about the Linton deposition differently. But in order to try to avoid motions practice, we have looked again at the schedule and can offer to present Linton on Nov 28 in DC. We know you will already be in DC for depositions Nov 28-Nov 30. And there is only 1 deposition currently on the calendar on Nov 28, unlike many other dates where there are 2 depositions already scheduled (including for example, Nov 30). Please let us know if Nov 28 in DC will work.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Heather Hacker <heather@hackerstephens.com>

Sent: Tuesday, November 8, 2022 6:46 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Andrew Stephens <andrew@hackerstephens.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

Relator is standing on the valid deposition notice issued to Melaney Linton for November 22, 2022. We attempted to work with you for weeks on an alternative date for her deposition after you said she was unavailable but you refused to provide a date within the discovery period and instead said she was unavailable in Texas until December 8. Ms. Linton is an officer of a party and if she fails to show for her scheduled deposition she and PPGC will be subject to sanctions under FRCP 37.

Thanks,
Heather

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Friday, November 4, 2022 3:51 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>

rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>; dashby@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Looking ahead to the Rossiter deposition next week, please let us know the names of folks from your teams that we should add to our security list, and the name of the court reporting company. In addition, all visitors, including court reporter and videographer, will need to sign the attached health attestation on the day of the depo.

I also wanted to follow up to see if you have figured out if you can do the Linton depo on Dec 8, 9, or 10 in Houston.

Thanks,
Tirzah

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Tuesday, November 1, 2022 7:26 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>

Subject: Re: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

We'll renotify if you don't comply with the 30(b)(6) and then you can decide whether to advise your client to not show up.

Andrew B. Stephens

Partner

Hacker Stephens LLP

www.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at [\(512\) 399-3022](tel:512-399-3022) and delete the message.

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Tuesday, November 1, 2022 6:23:13 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.

<Christopher.Odell@arnoldporter.com>; lgodesky@omm.com <lgodesky@omm.com>; jchapa@omm.com <jchapa@omm.com>; asantella@omm.com <asantella@omm.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; dashby@omm.com <dashby@omm.com>; lgodesky@omm.com <lgodesky@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, thanks for letting us know, though a little more notice would have been appreciated. We appreciate you stating that you won't likely need to depose him, but please understand that Affiliate Defendants do not agree to present Mr. Hons at a later date since Plaintiffs chose not to go forward on the date the parties had agreed on.

Thanks,
Tirzah

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Tuesday, November 1, 2022 10:19 AM

To: Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>; Hilton, Christopher <Christopher.Hilton@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Emily,

Based on our ongoing review of your document productions we do not need to depose Jeffrey Hons this Thursday and likely won't need to depose him at a later date unless the PPST 30(b)(6) witness is unable to testify on the topics noticed. Thanks for coordinating on the date/location.

Andrew

Andrew B. Stephens
Partner

HACKERSTEPHENS LLP
www.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>

Sent: Monday, October 31, 2022 7:04 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.

<Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; lgodesky@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Counsel,

Please let us know who is planning to attend this Thursday's deposition of Jeffrey Hons. As previously discussed, the deposition will take place at Akin Gump's San Antonio office (112 E Pecan St, Suite # 1010, San Antonio, TX 78205). The office is on the 10th floor and I can provide parking directions to attendees.

Please also confirm that Relator intends to start the deposition at the noticed time of 9AM CT.

Thanks,

Emily

Emily Reeder-Ricchetti
Associate | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6475

Emily.Reeder-Ricchetti@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Friday, October 28, 2022 2:08 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <zzz.External.dashby@omm.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Yes, thanks

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Friday, October 28, 2022 1:04 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; ichapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Just to confirm what we stated on the phone just now, we are moving the location of the Hons and PPST/PPSA/PPCC 30b6 depositions to Akin Gump's San Antonio office. Affiliates do not need a new notice for the changed date.

112 E. Pecan Street
Suite 1010
San Antonio, TX 78205-1512
sanantonioinfo@akingump.com

T

[+1 210.281.7000](tel:+12102817000)

F

[+1 210.224.2035](tel:+12102242035)

Thanks,
Tirzah

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 27, 2022 4:51 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <[dashby@omm.com](mailto:zzz.External.dashby@omm.com)>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Relator deposition is December 2 and PPGT is December 6 so those dates won't work for Exnicious.

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 10: Rossiter (DC), Arnold & Porter, 601 Massachusetts Ave., NW Washington, DC 20001

Nov 14: De Jong (Dallas), Office of the Attorney General, 1412 Main Street, Dallas, TX 75202

Nov 15: Trivisonno (Naples FL), 4851 Tamiami Trail North Park Shore, Suite 200, Naples, FL 34103

Nov 16: Exnicious (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 17-18: PPST/PPCC/PPSA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 21: Lambrecht (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Sokolow (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Linton (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 28: PPFA Custer (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 29: PPFA Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 30: Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Dec 1: PPGC (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 2: Relator (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 5: TX/HHSC 30(b)(6) (Austin), Office of the Attorney General, 300 West 15th Street,

Austin, TX 78701

Dec 6: PPGT (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 7: Dudney (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Kramer (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Lochabay (Dallas), 2100 Ross Avenue, 21st Floor, Dallas, TX 75201

Dec 9: Collucio (New York), 7 Times Square Tower, New York, NY 10036

Pending dates/locations from PPFA: Stewart, Collucio

Pending dates/locations from PP Affiliates: Linton

Pending dates/locations from TX: TX/HHSC 30(b)(6)

Pending dates/locations from 3rd parties: Maxwell, Spears, De Jong, Exnicious

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, October 27, 2022 12:01 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew:

Thanks for pulling back the subpoena. Exnicious can be deposed on Dec 2 or 6 in Houston. Can you make either of those work?

Thanks,
Tirzah

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Wednesday, October 26, 2022 4:39 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; zzz.External.dashby@omm.com <[dashby@omm.com](mailto:zzz.External.dashby@omm.com)>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; zzz.External.rgalin@omm.com <rgalin@omm.com>; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah, attached is a depo notice instead of subpoena.

Andrew

From: Andrew Stephens

Sent: Wednesday, October 26, 2022 3:32 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Tirzah. No problem re withdrawing the subpoena.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Wednesday, October 26, 2022 3:24 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com;

asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com; Ramer, Paula <Paula.Ramer@arnoldporter.com>

Subject: Re: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Andrew. That works. We will send a notice for Relator's depo and for Lochabay on the date Ray proposed.

We were disappointed to learn that Relator may be trying to serve a subpoena on Ronda Exnicious. She is a current employee of PPGC and a subpoena is not necessary or appropriate. We only learned on Monday that Relator would like to depose her and are working hard to propose a date or two as quickly as possible. I should be able to do that if not later today, then tomorrow. We would appreciate you withdrawing any subpoena and instructing the process server to halt efforts to serve her.

Thanks,
Tirzah

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Wednesday, October 26, 2022 3:14 PM

To: Lollar, Tirzah; zzz.External.dashby@omm.com; Raymond Winter

Cc: Amy Hilton; Heather Hacker; Margolis, Craig D.; Odell, Christopher M.;

zzz.External.lgodesky@omm.com; zzz.External.ichapa@omm.com;

zzz.External.asantella@omm.com; Reeder-Ricchetti, Emily; Pieper, Megan; Martin, Meghan C.;

Gerstner, Alyssa; zzz.External.rgalin@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Tirzah,

Relator is available in Houston on December 2 at Arnold & Porter office.

Andrew

From: Andrew Stephens

Sent: Tuesday, October 25, 2022 4:14 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.

<Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Tirzah, Danny,

Please see attached amended deposition notices for the Planned Parenthood witnesses and a notice of subpoenas for Marianne De Jong and Ronda Exnicious. The amended notices and subpoenas should reflect the agreed dates and locations listed below, with open issues highlighted and noted at end.

Relator is available on December 2 and we should have a location to you tonight or first thing tomorrow morning. Per Ray's email, Lochabay is available on December 8 in Dallas at the address listed below. I penciled in TX/HHSC 30(b)(6) on December 5 since that is one of the few remaining open dates, but Texas will need to confirm that date. Tirzah, we also need to discuss Linton.

Andrew

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 10: Rossiter (DC), Arnold & Porter, 601 Massachusetts Ave., NW Washington, DC 20001

Nov 14: De Jong (Dallas), Office of the Attorney General, 1412 Main Street, Dallas, TX 75202

Nov 15: Trivisonno (Naples FL), 4851 Tamiami Trail North Park Shore, Suite 200, Naples, FL 34103

Nov 16: Exnicious (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 17-18: PPST/PPCC/PPSA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 21: Lambrecht (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Sokolow (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Linton (Houston), Office of the Attorney General, 808 Travis Street, Suite 1520, Houston, TX 77022

Nov 28: PPFA Custer (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 29: PPFA Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Nov 30: Barrow-Klein (DC), O'Melveny & Meyers, 1625 Eye Street, NW Washington, DC 20006

Dec 1: PPGC (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 2: Relator (Houston), Arnold & Porter, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 5: TX/HHSC 30(b)(6) (Austin), Office of the Attorney General, 300 West 15th Street, Austin, TX 78701

Dec 6: PPGT (Austin), O'Melveny & Meyers, 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 7: Dudney (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Kramer (Chicago), 8770 West Bryn Mayr Avenue, Suite 1300, Chicago, IL 60631

Dec 8: Lochabay (Dallas), 2100 Ross Avenue, 21st Floor, Dallas, TX 75201

Dec 9: Collucio (New York), 7 Times Square Tower, New York, NY 10036

Pending dates/locations from PPFA: Stewart, Collucio

Pending dates/locations from PP Affiliates: Linton

Pending dates/locations from TX: TX/HHSC 30(b)(6)

Pending dates/locations from 3rd parties: Maxwell, Spears, De Jong, Exnicious

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Monday, October 24, 2022 7:25 PM

To: Andrew Stephens <andrew@hackerstephens.com>; dashby@omm.com; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; rgalin@omm.com

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Heather:

Following up on our call from earlier today, we wanted to confirm that you agreed that the 30b6 for PPST/PPSA/PPCC will take place on Nov 17 with Nov 18 as a spill over date if needed.

I'm not authorized at this point to accept service for Marianne DeJong.

See below for deposition locations. Note that we are still confirming that Kreager Mitchell has sufficient available conference room space. We know you want to issue new notices and would agree that if we have to change the location from Kreager Mitchell for the 2 depositions in San Antonio, you would not need to re-notice.

Nov 3: Hons (San Antonio), Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 10: Rossiter (DC) AP DC, 601 Massachusetts Ave., NW Washington, DC 20001

Nov 17: PPST/CC/SA (San Antonio) Kreager Mitchell, 7373 Broadway, San Antonio, TX 78209

Nov 21: Lambrecht (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701

Nov 22: Sokolow (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701

Dec 1: PPGC (Houston) AP Houston, 700 Louisiana Street, Suite 4000, Houston, TX 77002

Dec 6: PPGT (Austin), 303 Colorado Street, Suite 2750, Austin, TX 78701

Unfortunately, we have been unable to come up with an alternative date for Linton beyond the ones we previously offered. We would reiterate our offer to double track if you can take her deposition on December 8 in Houston. She is also available Dec 9, 10, or 16 in Houston. If you are willing to

take her deposition remotely, Dec 5 may still be an option. Please let us know if you would be able to make any of these options work.

As discussed, please let us know Relator's availability Dec 1-9 for Relator's deposition and the location.

Finally, Defendants would like to depose Lochabay on Nov 29-Dec 2 or Dec 8-9. We assume the deposition will be in Austin per Ray's note from some time ago, but please let us know.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Monday, October 24, 2022 5:35 PM

To: zzz.External.dashby@omm.com <dashby@omm.com>; Lollar, Tirzah

<Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>;

Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.

<Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>;

zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com

<asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>;

Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C.

<Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>;

zzz.External.rgalin@omm.com <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thank you, Danny.

Andrew

From: Ashby, Danny S. <dashby@omm.com>

Sent: Monday, October 24, 2022 3:20 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew and Heather -

Following up on our call earlier today, we're still working on dates for Emily Stewart and Rosemary Collucio. For Rosemary, you asked us to look at December 9 in NY and we will do that.

Separately, I was mistaken about the location of Kim Custer's 30(b)(6) deposition. We will present her in DC on the 28th, which should be easier for everyone given that Vickie Barrow-Klein is also scheduled in DC on the 29th and 30th. And both of these depositions will be in our DC office. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Thursday, October 20, 2022 11:25 AM
To: Ashby, Danny S. <dashby@omm.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Danny, Tirzah,

Please let us know if this schedule will work for Defendants:

Nov 3: Hons (Austin/SA)
Nov 10: Rossiter (DC)
Nov 15: Trivisonno (FL)
Nov 17: PPST/CC/SA (Austin/SA)
Nov 21: Lambrecht (Austin)
Nov 22: Sokolow (Austin)
Nov 28: PPFA Custer (NY)
Nov 29: PPFA Barrow-Klein (DC)
Nov 30: Barrow-Klein (DC)
Dec 1: PPGC (Houston)
Dec 5: Linton (Houston)
Dec 6: PPGT (Austin/Dallas)
Dec 7: Dudney (Chicago)
Dec 8: Kramer (Chicago)

Andrew

From: Ashby, Danny S. <dashby@omm.com>
Sent: Wednesday, October 19, 2022 7:26 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Yes, Vickie would be in DC and Kim would be in NYC (or possibly Philadelphia if you'd prefer). Separately, we represent Emily Stewart and will work on dates for her -- and we will circle back soon on Rosemary Coluccio. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dasbhy@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Wednesday, October 19, 2022 5:55 PM
To: Ashby, Danny S. <dasbhy@omm.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: [SUSPICIOUS MESSAGE] RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Thanks, Danny. Do you have proposed locations for Kim Custer and Vickie Barrow-Klein?

Andrew

From: Ashby, Danny S. <dasbhy@omm.com>
Sent: Wednesday, October 19, 2022 5:18 PM
To: Andrew Stephens <andrew@hackerstephens.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

Following up on this, we expect to have two 30(b)(6) witnesses -- Kim Custer and Vickie Barrow-Klein -- and you've asked for a fact witness

deposition of Vickie. Kim is available November 21 or 22 and Vickie is available November 29 or 30. In response to your email about providing multiple dates for each witness, perhaps you can slot in the ones where the dates work on your end and get back to us where you need other dates so we're not canvassing the entire group again. Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dasbhy@omm.com

From: Ashby, Danny S.

Sent: Wednesday, October 19, 2022 11:18 AM

To: 'Andrew Stephens' <andrew@hackerstephens.com>; Lollar, Tirzah

<Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>;

Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M.

<Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Chapa, Justin R.

<jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily

<Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>;

Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa

<Alyssa.Gerstner@arnoldporter.com>; Galin, Ross B. <rgalin@omm.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Hi Andrew -

We're working on the 30(b)(6) witness schedule and will get back to you ASAP on that -- as well as the two additional folks identified below. In the interim, based on the schedules we've confirmed so far, we would propose the following:

Teri Trivisonno - November 15 (Naples, FL)

Tamara Kramer - November 29 (Chicago)

Louis Dudney - December 9 (Chicago)

Louis has no availability on or before November 30, which is why we're proposing December 9. And, of course, we would agree that taking his deposition then would not affect the trial date or any other deadlines in

the case.

Thanks.

Danny

Danny S. Ashby
O: +1-972-360-1904
M: +1-214-577-9886
dashby@omm.com

From: Andrew Stephens <andrew@hackerstephens.com>
Sent: Wednesday, October 19, 2022 11:03 AM
To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>
Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; Godesky, Leah <lgodesky@omm.com>; Ashby, Danny S. <dashby@omm.com>; Chapa, Justin R. <jchapa@omm.com>; Santella, Amanda M. <asantella@omm.com>; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>
Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

[EXTERNAL MESSAGE]

Tirzah,

Thank you for sending proposed dates. Please let us know proposed dates for the PPFA Affiliate 30(b)(6) depositions so we can see how those will fit into the schedule. As you know, we noticed several of the 30(b)(6) depositions for the last week of November and would like to take those depositions at the end of the discovery period as noticed. Relator is generally available in November so we have some flexibility there. We also plan to subpoena Marianne DeJong unless you all will be representing her and can accept service.

Danny,

If you could provide proposed dates for the PPFA witnesses and the PPFA 30(b)(6) deposition that would help get the schedule nailed down. We also plan to subpoena Emily Stewart and Rosemary Coluccio unless you all will be representing them and can accept service.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS^{LLP}

http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlhNGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fK7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKIm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWlc58-PuyLdWrzdpVgBBtFxTIL48qrb4WlxAtvIrYlrFP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FiqPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Tuesday, October 18, 2022 5:55 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Raymond Winter <Raymond.Winter@oag.texas.gov>

Cc: Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com; Reeder-Ricchetti, Emily <Emily.Reeder-Ricchetti@arnoldporter.com>; Pieper, Megan <Megan.Pieper@arnoldporter.com>; Martin, Meghan C. <Meghan.Martin@arnoldporter.com>; Gerstner, Alyssa <Alyssa.Gerstner@arnoldporter.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew and Ray:

Following up on our call from yesterday and the notices Plaintiffs sent before the parties could discuss scheduling, please let us know if the below dates will work for the depositions you have requested.

Jeffrey Hons - Nov 3 (Austin)

Lou Rossiter - Nov 10 or 17 (Washington, DC)

Ken Lambrecht - Nov 20 (Austin)

David Sokolow - Nov 22 (Austin)

Melaney Linton - Dec 9 (Houston) - Ms. Linton has no availability on or before Nov 30, so we had to

propose a date just outside of the Nov 30 close of discovery. We would agree that taking her deposition on Dec 9 would have no impact on the trial date.

We are still working on dates and locations for the Affiliates' 30b6 depositions and will get back to you as soon as possible on them. But I did want to flag that Nov 1 will not work for the PPST 30b6 deposition.

PPFA will respond about their depositions.

Please also let us know if Nov 29 or 30 will work for the deposition of Relator. We assume that this deposition will take place in Austin (exact location to be determined by Defendants), but please confirm that Austin will work.

Thanks,
Tirzah

Tirzah Lollar
Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW
Washington, DC 20001-3743
T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com
www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:54 PM

To: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Margolis, Craig D.

<Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>;
Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com
<lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>;
zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com
<asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>;
Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Thanks, Tirzah. Only change in these is the dates.

Andrew

From: Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>

Sent: Thursday, October 13, 2022 6:43 PM

To: Andrew Stephens <andrew@hackerstephens.com>; Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Andrew, we would like to speak with you about the 30b6 notices on Monday. I'm just checking availability on our side and will revert with a proposed timeframe.

Did anything thing change in these amended notices other than the dates?

Thanks

Tirzah Lollar

Partner | [Bio](#)

Arnold & Porter

601 Massachusetts Ave., NW

Washington, DC 20001-3743

T: +1 202.942.6199

Tirzah.Lollar@arnoldporter.com

www.arnoldporter.com | [LinkedIn](#) | [Twitter](#)

From: Andrew Stephens <andrew@hackerstephens.com>

Sent: Thursday, October 13, 2022 7:40 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; zzz.External.lgodesky@omm.com <lgodesky@omm.com>; zzz.External.dashby@omm.com <dashby@omm.com>; zzz.External.jchapa@omm.com <jchapa@omm.com>; zzz.External.asantella@omm.com <asantella@omm.com>

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

External E-mail

Counsel:

Attached are Amended Notices of 30(b)(6) Depositions of PPFA, PPGT and PPGC. If you would like to discuss the dates or locations of these depositions, or the other depositions we have noticed, please let us know and we can schedule a call. Relator and the State are available anytime on Monday

(10/17), Wednesday morning (10/19), or Thursday morning (10/20).

Best regards,

Andrew

From: Andrew Stephens

Sent: Tuesday, October 11, 2022 8:04 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com; jchapa@omm.com; asantella@omm.com

Cc: Raymond Winter <Raymond.Winter@oag.texas.gov>; Amy Hilton <Amy.Hilton@oag.texas.gov>; Heather Hacker <heather@hackerstephens.com>

Subject: RE: United States ex rel Doe v. Planned Parenthood, No. 2:21-cv-00022-Z

Please see attached deposition notices. If you would like to discuss dates and locations please let us know and we can set up a call.

Andrew

Andrew B. Stephens

Partner

HACKERSTEPHENS LLP

http://secure-web.cisco.com/1hBce3F6l49Oe_vp-yUv1ON03g0XI93BXF9dCCpfAqsl58mDcr09W4q6zxNIGt1y3FPO4d4oTj57tkoeheaYorHjN1rDRKJL463FRnWBkrlINGXmPAXy6WJWP0AvmO1wLpvJ_qEdiA-abKrSLyrDFpgmMe9uzPgpkLoOunJTvvIMZvSHZJMPI3fk7a07BqmnqSTNofB-enmc1Ag2GeegWisYtyQwGTNzYQ-qJfXvTFKlm8KY5j-Vgao6ZH9grcJhfXFFXeFSlrVggWlc58-PuyldWrzdpVgBBtFxTIL48qrbri4WlxAtvIrYlrfP4xEX2G_XbZfA7AyVh7UDjppw4ox4hQINCod-1lpQKZyxMdpV78FigPg2HyhoGSrX_XmpdrpcZKwE4E7N0S3NAdmdac-sKECqIV8lahLWljQCryUcXBEXqAWthc3OKn3KWEc/http%3A%2F%2Fwww.hackerstephens.com

This message contains information that may be confidential and privileged. Unless you are the intended recipient (or authorized to receive for the intended recipient), you may not use, copy, or disclose to anyone the message or any information contained in the message. If you have received the message in error, please advise the sender by replying or by phone at (512) 399-3022 and delete the message.

From: Andrew Stephens

Sent: Thursday, September 1, 2022 12:07 PM

To: Margolis, Craig D. <Craig.Margolis@arnoldporter.com>; Lollar, Tirzah <Tirzah.Lollar@arnoldporter.com>; Hussain, Murad S. <Murad.Hussain@arnoldporter.com>; Odell, Christopher M. <Christopher.Odell@arnoldporter.com>; lgodesky@omm.com; dashby@omm.com;

Exhibit 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,

ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,

ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,

ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

Civil Action No. 2:21-CV-00022-Z

NOTICE OF DEPOSITION OF MELANEY LINTON

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Relator will take the deposition of Melaney Linton on November 28, 2022, beginning at 9:00 a.m., at 108 Wild Basin Road South, Suite 250, Austin, Texas 78746. The deposition will be stenographically and electronically recorded and will

be videotaped. The deposition will be used for discovery and/or evidentiary purposes to the full extent allowed by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

Respectfully submitted.

/s/ Andrew B. Stephens
Heather Gebelin Hacker
Texas Bar No. 24103325
Andrew B. Stephens
Texas Bar No. 24079396
HACKER STEPHENS LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746
(512) 399-3022
heather@hackerstephens.com
andrew@hackerstephens.com

Attorneys for Relator

CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2022, this document was served on all counsel of record via email.

/s/ Andrew B. Stephens
Andrew B. Stephens

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
THE STATE OF TEXAS,	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
THE STATE OF LOUISIANA,	§	
<i>ex rel.</i> ALEX DOE, Relator,	§	
	§	
	§	
Plaintiffs,	§	
	§	
v.	§	Civil Action No. 2:21-CV-00022-Z
	§	
PLANNED PARENTHOOD	§	
FEDERATION OF AMERICA, INC.,	§	
PLANNED PARENTHOOD GULF	§	
COAST, INC., PLANNED	§	
PARENTHOOD OF GREATER	§	
TEXAS, INC., PLANNED	§	
PARENTHOOD SOUTH	§	
TEXAS, INC., PLANNED	§	
PARENTHOOD CAMERON	§	
COUNTY, INC., PLANNED	§	
PARENTHOOD SAN ANTONIO,	§	
INC.,	§	
	§	
Defendants.	§	

PLAINTIFFS' NOTICE OF DEPOSITION OF MELANEY LINTON

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiffs will take the deposition of Melaney Linton on November 22, 2022, beginning at 9:00 a.m., at the Office of the Texas Attorney General, 808 Travis Street, Suite 1520, Houston, Texas 77022. The deposition will be stenographically

and electronically recorded and will be videotaped. The deposition will be used for discovery and/or evidentiary purposes to the full extent allowed by the Federal Rules of Civil Procedure and the Federal Rules of Evidence.

Respectfully submitted.

/s/ Andrew B. Stephens
Heather Gebelin Hacker
Texas Bar No. 24103325
Andrew B. Stephens
Texas Bar No. 24079396
HACKER STEPHENS LLP
108 Wild Basin Road South, Suite 250
Austin, Texas 78746
(512) 399-3022
heather@hackerstephens.com
andrew@hackerstephens.com

Attorneys for Relator

CERTIFICATE OF SERVICE

I hereby certify that on October 25, 2022, this document was served on all counsel of record via email.

/s/ Andrew B. Stephens
Andrew B. Stephens